

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

PRIME CAPITAL VENTURES, LLC,

Plaintiff,

v.

REIGN FINANCIAL INTERNATIONAL,
INC., GIORGIO JOHNSON, GARY MILLS,
AND MARTIN KARO,

Defendants.

Case No. 23-cv-207 (FJS/DJS)

**NOTICE OF MOTION TO COMPEL ARBITRATION OR,
IN THE ALTERNATIVE, TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion To Compel Arbitration Or, In The Alternative, To Dismiss The Amended Complaint, dated June 12, 2023, and upon all the prior proceedings in this case to date, Defendants move this Court, before the Honorable Frederick J. Scullin, at the United States District Court for the Northern District of New York, James M. Hanley Federal Building & U.S. Courthouse, 100 S. Clinton Street, Syracuse, NY 13261, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), compelling arbitration of the claims set forth in the Amended Complaint or, in the alternative, dismissing the Amended Complaint for lack of personal jurisdiction and failure to state a claim.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 7.1(a), opposition papers, if any, are required to be served no later than July 3, 2023.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 7.1(a), reply papers if any, are required to be served no later than July 10, 2023.

REQUEST FOR ORAL ARGUMENT

Oral argument on the motion is requested due to the complexity of the legal issues. Oral argument will allow for a complete and dynamic explanation and discussion of the inadequacy of the Amended Complaint. Adam Shaw will argue the motion.

Respectfully Submitted,

Date: June 12, 2023

By: /s/ Adam R. Shaw
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